

The Honorable Richard A. Jones

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GETTY IMAGES, INC., a Delaware  
Corporation,

Plaintiff,

vs.

ROXANNE MOTAMEDI, an individual,

Defendant.

Case No. 2:16-cv-1892

DECLARATION OF ANNE HATCHER  
IN SUPPORT OF PLAINTIFF'S  
MOTION FOR SUMMARY JUDGMENT

I, Anne Hatcher, declare as follows:

1. I am the Vice President, Human Resources of a wholly owned subsidiary of Getty Images, Inc. ("Getty Images"). I am over 18 years of age, and competent to testify and I have personal knowledge of the facts set forth in this declaration.

2. I have worked for Getty Images for more than 15 years and, in my role, am responsible for the management of all human resources records and policies in North America for all of Plaintiff's subsidiaries.

3. Getty Images has procedures in place to protect the confidentiality of its proprietary and trade secret information. For example, all employees must sign a Non-Disclosure Agreement as a condition of being allowed access to Getty Images' trade secrets and confidential information.

1           4.       I have reviewed the personnel records kept by Getty Images for Defendant  
2 Roxanne Motamedi. Attached hereto as Exhibit 1 is a true and correct copy of her Non-  
3 Disclosure Agreement signed on February 17, 2000.

4           5.       Attached hereto as Exhibit 2 is a true and correct copy of her Employee  
5 Confidentiality and Assignment of Inventions Agreement signed on February 17, 2001.

6           6.       Attached hereto as Exhibit 3 is a true and correct copy of her Employee  
7 Confidentiality and Assignment of Inventions Agreement that is undated.

8           7.       Attached hereto as Exhibit 4 is a true and correct copy of her Confidentiality and  
9 Non-Disclosure Agreement signed on April 1, 2001.

10          8.       The non-disclosure agreements define Getty Images' "Confidential Information,"  
11 which includes "information not known by actual or potential competitors of Getty Images,"  
12 trade secrets, financial information, royalty rates, business plans and strategies, techniques, data  
13 relating to Getty Images or its affiliates, client lists, contractual terms and relationships. The  
14 agreements require employees to safeguard Getty Images' confidential information and to not  
15 disclose, transfer or use its confidential information for any purpose other than the conduct of  
16 Getty Images' business. The agreements also agreed to return all confidential information to be  
17 returned to Getty Images upon an employee's termination.

18          9.       All visitors to Getty Images' facilities are required to sign in with security and/or  
19 the front desk and be issued a guest pass. Once inside, they must be escorted by a Getty Images  
20 employee. All work areas are locked and accessible only with a key card. Employees are  
21 required to use a password to log on to Getty Images' systems. Employee access to data on Getty  
22 Images' servers and cloud storage sites is limited by position and need-to-know. *i.e.*, persons at  
23 Ms. Motamedi's level and above are trusted with much more access to confidential data than  
24 lower level employees.

25          10.       Adrian Murrell was formerly employed by Getty Images as a Senior Vice  
26 President, Editorial Imagery until his employment ended on June 30, 2014.

1 I declare under penalty of perjury under the laws of the State of Washington that the  
2 foregoing is true and correct.

3  
4 DATED this 31 day of October, 2017 at Seattle, Washington

5  
6   
Anne Hatcher